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July 30, 2015

**VIA E-MAIL AND VIA OVERNIGHT**

Ms. Cynthia Brown  
Removal Enforcement Coordinator  
Superfund Enforcement Assessment Section  
(6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733  
[Brown.cynthia@epa.gov](mailto:Brown.cynthia@epa.gov)

**Re: Supplemental Request for Information Pursuant to Section 104(e)(2) of CERCLA  
U.S. Oil Recovery Superfund Site, Pasadena, Harris County, Texas**

Dear Ms. Brown:

The City of Pasadena, Texas (the “City”), respectfully submits this response to the U.S. Environmental Protection Agency’s (“EPA”) July 1, 2015 Supplemental Request for Information Pursuant to Section 104(e)(2) of CERCLA regarding the U.S. Oil Recovery Superfund Site, located in Pasadena, Harris County, Texas (“**Supplemental Information Request**”). The City’s response is timely pursuant to EPA’s email on July 13, 2015 granting the City an extension until July 31, 2015 to respond to the Supplemental Information Request.

This response addresses EPA questions regarding operations of the City’s municipal wastewater treatment operations at the Old Vince Bayou wastewater treatment plant (“**Old Vince**”) located at 200 N. Richey. The City’s operations at the Old Vince concluded in April 2004. Prior to conclusion of operations, the City contracted with Severn Trent Environmental Services, Inc. (“**STES**”) to operate the Old Vince. Therefore, the City contacted STES to identify individuals with knowledge of Old Vince operations to assist in providing responses to EPA’s Supplemental Information Request. Therefore, the information contained in this response has been provided by employees of STES.

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The City further notes that U.S. Oil Recovery conducted operations at the Old Vince after the City sold it in 2009 and may have substantially altered the workings or other configurations of Old Vince. Due to the fact that the City concluded operations at Old Vince in 2004, the answers contained in this response are based on the best recollection of the individuals with relevant knowledge based on their knowledge at the time the operations ceased in 2004.

Prior to the Supplemental Information Request, EPA had informally asked the City to provide assistance with supplying similar information as that contained in the Supplemental Information Request. The City replied that it was willing to assist in gathering relevant information that it could, but requested clarification regarding relief from any potential liability for entering on or providing care and advice relative to the U.S. Oil Recovery Superfund Site. The City did not receive a response from EPA to this communication. EPA, however, has chosen to pursue a more formal process to seek similar information through this Supplemental Information Request.

The following individuals were relied on for producing the answers to each question presented in the Supplemental Information Request:

1. Richard Neely  
Project Manager, Pasadena Project  
Severn Trent Environmental Services, Inc.  
209 N. Main St, Pasadena, TX 77506  
713-477-5856 (office)
2. Greg Jalowy  
Former Chief Operator, Old Vince Bayou WWTP  
Severn Trent Environmental Services, Inc.  
209 N. Main St, Pasadena, TX 77506  
713-477-5856 (office)
3. Brooks Bailey  
Former Chief Operator, Old Vince Bayou WWTP  
Severn Trent Environmental Services, Inc.  
209 N. Main St, Pasadena, TX 77506  
713-477-5856 (office)

Pursuant to the City's request, the City understands that STES undertook a reasonable and proportionate search for documentation concerning whether schematics were available that show the hydraulic connections and valve locations within Old Vince. The City understands that STES did not find such schematics. In addition, due to the poor quality of the supplied schematics attached to the Supplemental Information Request, STES personnel have drawn simplified schematics, Figures 1 and 2, for use in approximating the means and locations of hydraulic connections and valve locations. As far as Mr. Jalowy and Mr. Bailey can apparently recall, bearing in mind the length of time since the plant was decommissioned in April 2004, they believe the attached site plans are reasonably accurate. The attachments, however, are not engineering drawings of the Old Vince; nor are they drawn to scale. As noted, the City understands that the

schematics were developed from the best recollection of operators of the Old Vince to assist in responding to this Supplemental Information Request and in no way does STES or the City attest to or certify the accuracy of the attached schematics.

**Response To EPA's Supplemental Information Request to Pasadena, Texas**

- 1. What were the means of hydraulic connections between the various units on the MCC property and the lift stations (lift station 1, sand filter, oxygen digesters, etc.) during the time in which the property was operated and owned by the City of Pasadena? Please use the provided schematics for mark-up in addition to any written responses.**

Please see Figures 1 and 2 for the best estimate of the means and locations of the hydraulic connections between the various units on the MCC property and the lift stations during the time in which the property was operated and owned by the City of Pasadena.

The supplied schematics were of too poor quality to provide an accurate mark-up.

- 2. What were the means of hydraulic connections between the chlorine contact chamber, sand filter, and any other connected units at the MCC property during the time in which the property was operated and owned by the City of Pasadena? Please use the provided schematics for mark-up in addition to any written responses.**

Please see response under item 1 above.

- 3. In respect to the hydraulic connections between the units at MCC (chlorine contact chamber, sand filter, oxygen digesters, left stations, etc.), where and how can the connections be closed or controlled (Are there valves? Can they be closed? Where are the valves)?**

Please see Figures 1 and 2 for the best estimate of the approximate locations of control valves between the various units on the plant property.

Since many years have passed since the plant was taken out of service in 2004, there is no way to know if the valves are currently operational and/or if MCC/USOR removed or altered the valves or the piping connections between the various units after the site was purchased by MCC/USOR.

- 4. Can you confirm that the schematics provided that were shared by TCEQ are accurate, and if so, please indicate valve locations and any hydraulic connections between any and all units?**

The schematics provided with the Supplemental Information Request are of poor

quality and difficult to verify. As such, STES personnel were unable to confirm the accuracy of the schematics. Please see Figures 1 and 2 for the approximate valve locations and hydraulic connections between the various units on the Old Vince Bayou.

- 5. Is the city willing to have a technical representative meet EPA at the MCC property to visually show the locations indicated by the City on the schematic? If so, please provide the contact information for the representative and a time frame (date) this could be done.**

The former City employees with knowledge of the Old Vince now work for STES. Therefore, the City has no technical representative that could meet with EPA at the MCC property (Old Vince). The City has no current contractual relationship with STES for services at the Old Vince and cannot require STES employees to meet with EPA. The City, however, enquired whether the appropriate STES personnel would be willing to meet EPA at the MCC property (200 North Richey) to work with EPA on this request. The City understands from STES that Mr. Jalowy is available to meet an EPA representative at the former plant site. EPA may contact Mr. Jalowy at 713-477-5856 to set arrangements.

Figure 1 – Old Vince Bayou WWTP (East Side)

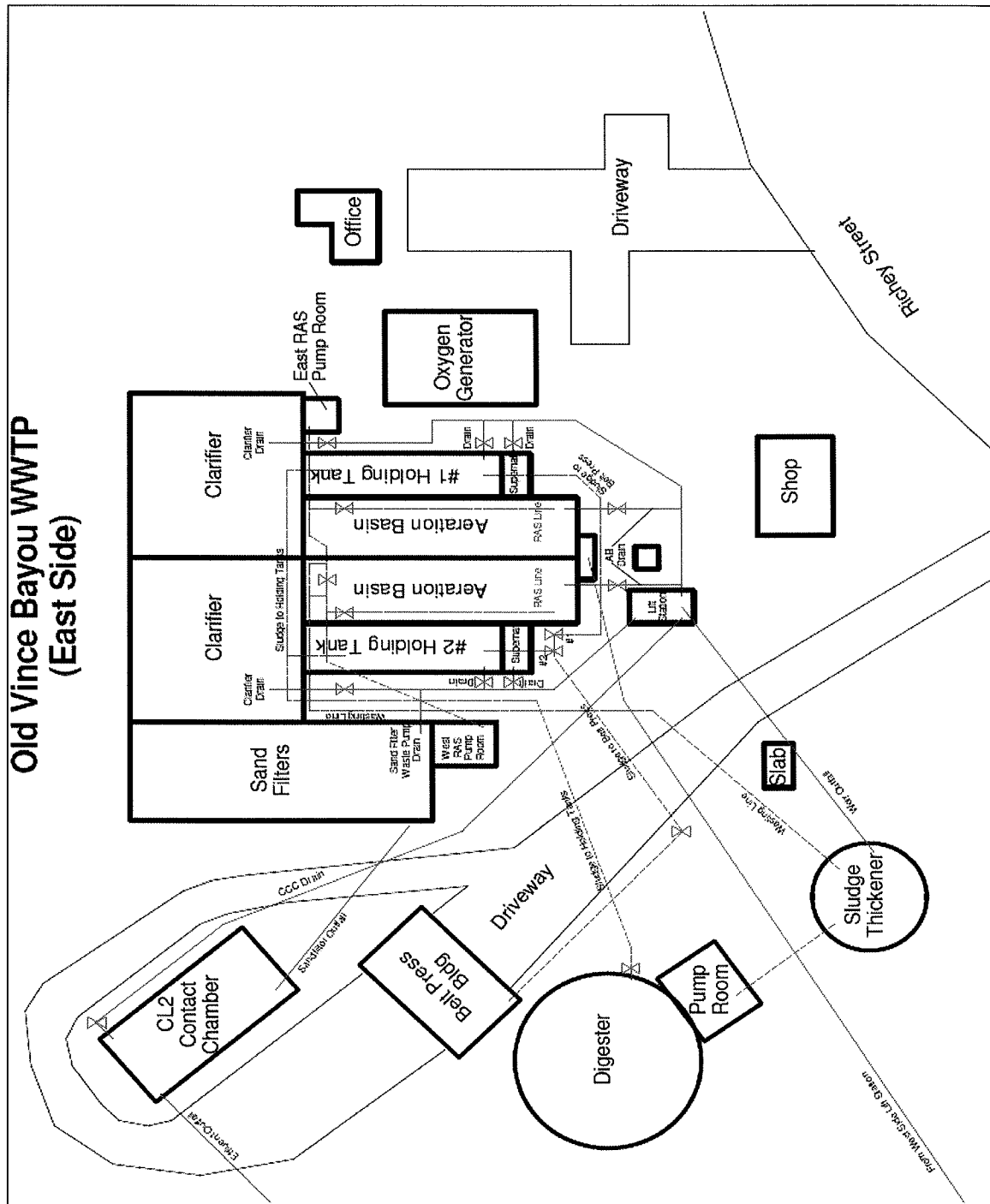
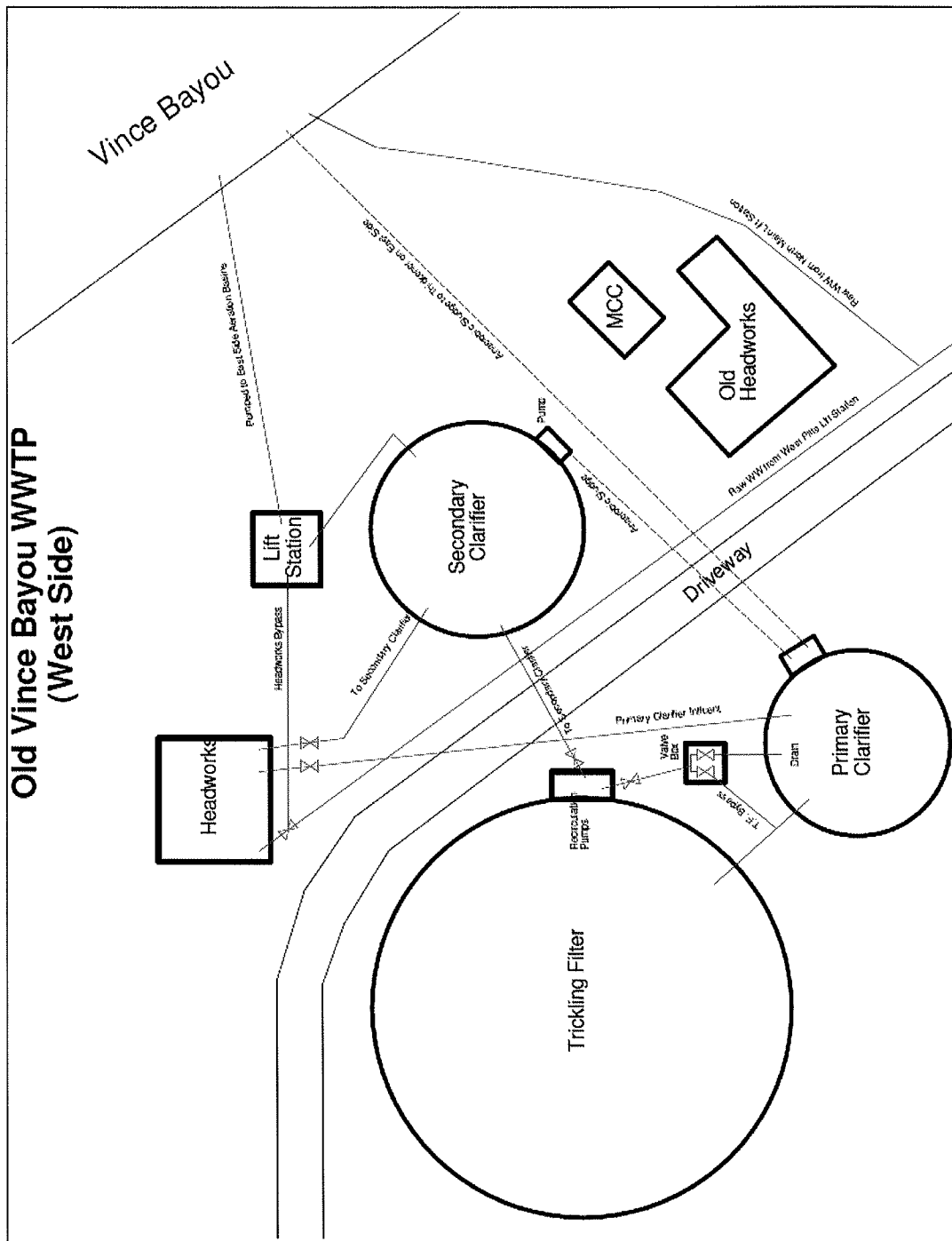
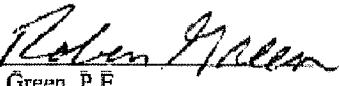


Figure 2 – Old Vince Bayou WWTP (West Side)



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The information provided in this document is, to the best of my knowledge, true and accurate.

  
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Robin Green, P.E.  
Public Works Director  
City of Pasadena

cc: Edwin Quinones, Assistant Regional Counsel, U.S. EPA Region 6